

1 Crisostomo G. Ibarra (SBN 103480)
2 Gener D. Benitez (SBN 206765)
3 Ibarra Professional Law Corporation
4 459 Fulton Street, Suite 109
5 San Francisco, CA 94102
6 (415) 398-5329

7
8
9
10
11 Attorneys for Plaintiff
12 PHALKUN BUN HEANG
13
14
15
16

17 UNITED STATES DISTRICT COURT

18 FOR THE NORTHERN DISTRICT OF CALIFORNIA

19
20
21 PHALKUN BUN HEANG

22 Plaintiff,

23 vs.

24 DEP'T OF HOMELAND SECURITY,

25 Defendant.

26 Case No.: CV-16-06304 JCS

27 **STIPULATION OF DISMISSAL**
28 **[FRCP 41(a)(1)(A)(ii)]**

29
30 Plaintiff PHALKUN BUN HEANG, and Defendant DEPARTMENT OF HOMELAND
31 SECURITY, pursuant to Rule of Civil Procedure 41(a)(1)(A)(ii), and the Settlement Agreement
32 filed November 3, 2017 (Docket No. 38-1), hereby file this Stipulation for Dismissal. The
33 Complaint is dismissed in its entirety with prejudice. The Court shall retain jurisdiction for the
34 purposes of enforcing the settlement agreement and protective order in this case (see Docket
35 Nos. 38 and 39).

36 ////

37 ////

38 ////

39 ////

40 ////

1 Dated: January 24, 2018

2 Ibarra Professional Law Corporation

3

4 /s/ Crisostomo G. Ibarra

5 By: Crisostomo G. Ibarra
6 Attorneys for Plaintiff
7 PHALKUN BUN HEANG

8 Dated: January 24, 2018

9

10 /s/ David A. Pereda

11 By: David A. Pereda
12 Assistant United States Attorney
13 Attorneys for Defendant
14 DEP'T OF HOMELAND SECURITY

15 Dated: January 25, 2018



16

17

18

19

20

21

22

23

24

25

26

27

28